



ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

MIKE GLEASON
Commissioner

JEFF HATCH-MILLER
Commissioner

Arizona Corporation Commission

DOCKETED

MAR 28 2003

DOCKETED BY	<i>[Signature]</i>
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2003 MAR 28 P 3:05
ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION
OF THE ARIZONA ELECTRIC DIVISION
OF CITIZENS COMMUNICATIONS
COMPANY TO CHANGE THE CURRENT
PURCHASED POWER AND FUEL
ADJUSTMENT CLAUSE RATE, TO
ESTABLISH A NEW PURCHASED
POWER AND FUEL ADJUSTMENT
CLAUSE BANK, AND TO REQUEST
APPROVED GUIDELINES FOR THE
RECOVERY OF COSTS INCURRED IN
CONNECTION WITH THE ENERGY
RISK MANAGEMENT INITIATIVES.

DOCKET NO. E-01032C-00-0751

IN THE MATTER OF THE APPLICATION
OF CITIZENS COMMUNICATIONS
COMPANY, ARIZONA GAS DIVISION,
FOR A HEARING TO DETERMINE THE
FAIR VALUE OF ITS PROPERTIES FOR
RATEMAKING PURPOSES, TO FIX A
JUST AND REASONABLE RATE OF
RETURN THEREON, AND TO APPROVE
RATE SCHEDULES DESIGNED TO
PROVED SUCH RATE OF RETURN.

DOCKET NO. G-01032A-02-0598

1 IN THE MATTER OF THE JOINT)
2 APPLICATION OF CITIZENS)
3 COMMUNICATIONS COMPANY AND)
4 UNISOURCE ENERGY CORPORATION)
5 FOR THE APPROVAL OF THE SALE OF)
6 CERTAIN ELECTRIC UTILITY AND)
7 GAS UTILITY ASSETS IN ARIZONA,)
8 THE TRANSFER OF CERTAIN)
9 CERTIFICATES OF CONVENIENCE)
10 AND NECESSITY FROM CITIZENS)
11 COMMUNICATIONS COMPANY TO)
12 UNISOURCE ENERGY CORPORATION,)
13 THE APPROVAL OF THE FINANCING)
14 FOR THE TRANSACTIONS AND OTHER)
15 RELATED MATTERS.)

DOCKET NO. E-01933A-02-0914
DOCKET NO. E-01032C-02-0914
DOCKET NO. G-01032A-02-0914

10 **JOINT APPLICANTS' RESPONSE TO**
11 **SOUTHWEST GAS CORPORATION'S SUPPLEMENTAL**
12 **APPLICATION FOR LEAVE TO INTERVENE**

12 In its original Application for Intervention, Southwest Gas Corporation
13 ("Southwest") candidly admitted that its real interest in this proceeding concerns the
14 policies or precedents that might be set that could have an impact on future proceedings.
15 Having been denied intervention on those grounds, Southwest now files a Supplemental
16 Application seeking to pursue its interest in this proceeding by using the "hook" that it is a
17 vendor/supplier for Tucson Electric Power ("TEP").¹ In other words, Southwest seeks
18 intervention in this case because it sells natural gas to TEP under a Commission approved
19 special retail contract. Southwest Gas implies, without any support, that it is concerned
20 about TEP's ability to perform that special retail contract with TEP. This case is not the
21 proper forum for addressing Southwest Gas' concerns about its special retail contract with
22

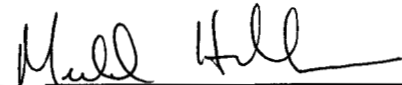
25 _____
26 ¹ Southwest also alleges that it is a customer of both TEP and Citizens, but it is clearly basing its intervention request on its role as a creditor/vendor of TEP.

1 TEP. Indeed, any such concerns are addressed by the terms of the special retail contract
2 and applicable tariff provisions. Southwest's Supplemental Intervention Application
3 should be denied.
4

5 If the Commission is inclined to grant this Supplemental Intervention, Southwest's
6 intervention should be limited to the TEP loan to UniSource.

7 RESPECTFULLY SUBMITTED this 28th day of March, 2003.
8

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16 ORIGINAL AND seventeen (17) copies
17 of the foregoing hand-delivered
18 this 28th day of March, 2003, to:

19 Arizona Corporation Commission
20 Utilities Division – Docket Control
21 1200 W. Washington Street
22 Phoenix, Arizona 85007

23 COPY of the foregoing hand-delivered
24 this 28th day of March, 2003, to:

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26 Lisa A. VandenBerg
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11 COPY of the foregoing sent by mail
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